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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,) NO. CR 18-0519 RS

14 Plaintiff,)

15 v.)

16 ERIC HERRERA,)

17 Defendant.)

18) **STIPULATION AND ~~PROPOSED~~ ORDER TO**
CONTINUE HEARING FROM MARCH 5, 2019,
TO MARCH 19, 2019, AND TO EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT

19
20 The parties appeared before the Court on February 5, 2019, for a status conference. At that time,
21 a further status was scheduled for March 5, 2019. The government has produced discovery and extended
22 a tentative plea offer. The Defendant at this time anticipates entering an open plea to the charges.

23 Based on an unanticipated scheduling conflict on behalf of government counsel, the parties
24 request that the March 5, 2019, hearing be continued to March 19, 2019 at 2:30 p.m. The parties agree
25 and jointly request that the time between March 5, 2019, and March 19, 2019, should be excluded in
26 order to provide reasonable time necessary for the continuity and effective preparation of counsel,
27 pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of justice are served by
28 granting the continuance outweigh the best interests of the public and the defendant in a speedy trial.

1 SO STIPULATED:

2 DAVID L. ANDERSON
3 United States Attorney

4 DATED: February 28, 2019

5 /s/
6 SAILAJA M. PAIDIPATY
Assistant United States Attorneys

7 DATED: February 28, 2019

8 /s/
9 DANIEL BLANK
Attorney for the Defendant

~~PROPOSED~~ ORDER

Based on the reasons provided in the stipulation of the parties above, the Court hereby FINDS that for adequate preparation of the case by all parties and continuity of counsel, and in the interest of justice, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), an exclusion of time is warranted under the Speedy Trial Act. Based on these findings, IT IS HEREBY ORDERED THAT the hearing is continued until March 19, 2019 at 2:30 p.m., and time is excluded until March 19, 2019.

DATED: 2/28/19


HON. RICHARD SEEBORG
United States District Judge